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May 6, 2019

**VIA ELECTRONIC FILING & U.S. MAIL**

Honorable Steven C. Mannion, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Bldg. &  
U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**RE: *Shire US, Inc. v. Allergan, Inc., Allergan Sales, LLC, and Allergan USA, Inc.*  
Civ. A. No. 2:17-cv-7716 (JMV) (SCM)**

Dear Judge Mannion:

This firm, together with Gibson, Dunn & Crutcher LLP, represents Defendants Allergan, Inc., Allergan Sales, LLC, and Allergan USA, Inc. (collectively, "Allergan") in the above-referenced antitrust action. We write concerning Plaintiff Shire US, Inc.'s ("Shire") Second Amended Complaint filed on April 25, 2019 at DE No. 79 (the "SAC"). Pursuant to Fed. R. Civ. P. 15(a)(3), Allergan's response to the SAC is due Thursday May 9, 2019.

Allergan intends to move to dismiss the SAC and has met and conferred with Shire regarding a briefing schedule. To this effect, and with Shire's consent, Allergan proposes the following briefing schedule:

- Allergan shall move to dismiss the SAC on or before **May 28, 2019**;
- Shire's Opposition to Allergan's Motion to Dismiss shall be filed on or before **July 3, 2019**; and
- Allergan's Reply in Further Support of its Motion to Dismiss shall be filed on or before **July 19, 2019**.

If this schedule is acceptable, Allergan respectfully requests that Your Honor "So Order" this letter and place it on the docket.

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We thank the Court for its attention to this matter. Should Your Honor or Your Honor's staff have any questions or require anything further, we are always available.

Respectfully submitted,

*s/Liza M. Walsh*

Liza M. Walsh

cc: All Counsel of Record (via ECF and email)

**SO ORDERED THIS \_\_\_\_ DAY OF MAY, 2019.**

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**HON. STEVEN C. MANNION, U.S.M.J.**